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18 Insurance Company*

19 **UNITED STATES DISTRICT COURT**
20 **DISTRICT OF NEVADA**

21 FONZIE LEE JOHNSON, an individual,

22 CASE NO.: 2:24-cv-01781

23 Plaintiff,

24 **STIPULATION AND ORDER TO
25 EXTEND SECURITY LIFE OF
DENVER INSURANCE
COMPANY'S DEADLINE TO
RESPOND TO PLAINTIFF'S
COMPLAINT [FIRST REQUEST]**

26 vs.

27 SECURITY LIFE OF DENVER INSURANCE
28 COMPANY; RESOLUTION LIFE GROUP
HOLDINGS LTD; VOYA FINANCIAL, INC.;
DOE INDIVIDUALS I THROUGH X; ROE
ENTITIES I THROUGH X, INCLUSIVE,

29 Defendants.

30 Pursuant to Local Rule IA 6-1(a), Plaintiff FONZIE LEE JOHNSON and Defendant
31 SECURITY LIFE OF DENVER INSURANCE COMPANY (together, the "Parties"), by and
32 through their respective counsel, hereby stipulate and respectfully request that the Court enter
33 an order extending the time for Security Life to respond to Plaintiff's Complaint as follows:

34 1. Plaintiff filed a Verified Complaint and Demand for Jury Trial on July 23, 2024.
35 2. Security Life was served on August 26, 2024.
36 3. To facilitate ongoing settlement discussions, Plaintiff and Security Life agreed to

1 extend Security Life's deadline to respond to Plaintiff's Complaint in state court to September
2 23, 2024.

3 4. Security Life removed this action to this Court on September 23, 2024, making
4 September 30, 2024 Security Life's deadline to respond to Plaintiff's Complaint. Fed. R. Civ.
5 P. 81(c)(2)(C).

6 5. The Parties are currently engaged in settlement discussions and believe that the
7 requested extension would enable them to further pursue early resolution efforts and avoid the
8 expenditure of unnecessary legal costs and judicial resources.

9 6. The Parties enter into this Stipulation in good faith, and not for the purposes of
10 delay. No prior extensions of time have been requested from this Court or granted by this Court.
11 The requested extension will not alter the date of any other event or deadline already fixed by
12 Court order, and there is no trial date.

13 7. For the foregoing reasons, the Parties hereby stipulate and agree that the date by
14 which Security Life must respond to Plaintiff's Complaint shall be extended from September
15 30, 2024 to **October 30, 2024**.

16 Dated: September 27, 2024

17 By: /s/ Shawanna L. Johnson
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Respectfully submitted,

22 By: /s/ Charles H. McCrea
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24 *Attorneys for Defendant Security Life of
Denver Insurance Company*

IT IS SO ORDERED.

DATED this 1 Day of October, 2024.


UNITED STATES MAGISTRATE JUDGE